

**Federal Defenders
OF NEW YORK, INC.**

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February 18, 2021

BY ECF and EMAIL

The Honorable Judge Paul A. Engelmayer
United States District Courthouse
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: United States v. Zoilo Taveras
20 CR. 240 (PAE)**

Dear Judge Engelmayer:

In response to the Court's February 16 order, the parties submit this joint letter. The defense believes that the March 3 hearing should proceed as a change of plea proceeding as the parties have reached a resolution in this matter. The defense further requests that the change of plea proceeding be conducted remotely given the ongoing COVID-19 pandemic. A remote proceeding would minimize the risks to the parties and Mr. Taveras, whose age and underlying health conditions render him more vulnerable to serious illness if exposed to the novel coronavirus. Mr. Taveras is not detained and would consent to proceeding by telephone or video, although telephone is preferred. The Government consents to these requests.

Finally, the parties request that the court adjourn the pending motions deadlines given their intent to move forward with a change of plea proceeding on March 3.

Respectfully submitted,

GRANTED. The Court will arrange for a remote change-of-plea hearing to be held on March 3, 2021. In light of the parties' representations that a guilty plea is forthcoming that day, the Court adjourns all intervening deadlines. The Clerk of Court is requested to terminate the motion at Dkt. No. 41.

_____/s/_____
Zawadi Baharanyi
Assistant Federal Defender
(212) 417-8735

2/19/2021

SO ORDERED.

Paul A. Engelmayer
PAUL A. ENGELMAYER
United States District Judge